

# IRS News Release

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## **IRS, The George Washington University Law School Sponsor Institute on International Tax Issues**

IR-2006-157, October 12, 2006

WASHINGTON — The Internal Revenue Service today announced the 19th Annual Institute on Current Issues in International Taxation. It is jointly sponsored by the IRS and The George Washington University Law School and will be held on December 14 and 15, 2006, at the Grand Hyatt Washington Hotel in Washington, DC. Registration is underway for the Institute, which is intended for international tax professionals.

The program will present an opportunity for top IRS and Treasury officials, tax experts and leading private sector specialists to address breaking issues and present key perspectives on new developments. The first day will feature a discussion by U.S. and foreign tax authorities of current international tax controversies and includes sessions on:

- Developing Treaty Issues
- Foreign Tax Credit Guidance for Pass-Through Entities
- Transfer Pricing Update
- New Guidance on Foreign Branch Transactions
- Case Studies in International Restructurings.

IRS Commissioner Mark W. Everson will deliver the luncheon address.

The second day will focus on the following topics:

- International Tax Challenges
- Working with the New Subpart F “Look Through” Rule
- Emerging Issues in Cross-Border Private Equity Transactions.
- Ask the IRS” panel featuring senior officials from the Service.

Eric Solomon, Acting Deputy Assistant Secretary for Tax Policy at the Treasury Department, will deliver the luncheon address.

Those interested in attending or obtaining more information should contact The George Washington University Law School, at <http://www.law.gwu.edu/ciit>.